

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY
CAMDEN VICINAGE**

KYLE BURNS, on behalf of himself and all
others similarly situated,

Plaintiff,

v.

TD BANK, N.A.,

Defendant.

Civil Action No. 1:21-cv-18194-RBK-AMD

**NOTICE OF MOTION FOR
PRO HAC VICE ADMISSION**

Motion Date: December 6, 2021

TO: ALL COUNSEL OF RECORD

PLEASE TAKE NOTICE that Defendant TD Bank, N.A. (“TD Bank”) will move before this Court at the Mitchell H. Cohen Building & U.S. Courthouse, 4th and Cooper Streets, Camden, NJ 08101, on December 6, 2021, for entry of an Order pursuant to Local Civil Rule 101.1(c) admitting as counsel pro hac vice in this matter Cameron R. Goodwin of the law firm of Pierce Atwood LLP.

PLEASE TAKE FURTHER NOTICE that TD Bank will rely upon the Certification of Cameron R. Goodwin, and the Certification of Susan M. Leming in support of the admission.

PLEASE TAKE FURTHER NOTICE that all Plaintiffs consent to the *pro hac vice* admission of Cameron R. Goodwin.

PLEASE TAKE FURTHER NOTICE that a Proposed Order granting *pro hac vice* admission to Cameron R. Goodwin is attached.

Dated: November 12, 2021

Respectfully submitted,
BROWN & CONNERY, LLP

/s/ Susan M. Leming
Susan M. Leming, Esquire
BROWN & CONNERY, LLP
360 Haddon Avenue
Westmont, New Jersey 08108
(856) 854-8900 (phone)
(856) 858-4967 (fax)

Attorneys for Defendant TD Bank, N.A.